

EXHIBIT F

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CERTIFIED COPY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ROOTS READY MADE GARMENTS CO.)
W.L.L.,)

Plaintiffs,)

vs.) No. C 07-03363 CRB
VOLUME I

THE GAP, INC., a/k/a, GAP,)
INC., GAP INTERNATIONAL SALES,)
INC., BANANA REPUBLIC, LLC,)
AND OLD NAVY, LLC,)

Defendants.)

CONFIDENTIAL TRANSCRIPT

VIDEOTAPED DEPOSITION OF RON YOUNG, taken
at One Front Street 33rd Floor San Francisco,
CA, commencing at 9:25 a.m., Thursday,
June 5, 2008, before Kenneth T. Brill, CSR
No. 12797.

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1 Q. Now, the -- Gap the ISP merchandise
2 directly to Roots' warehouse as well; correct?

3 A. No. We delivered -- what we did is -- is
4 that at the -- we delivered it into Dubai in the
5 Jebel Ali duty-free zone to EI, made it available
6 for pick up. At that point, that inventory was
7 picked up, and then we billed Gabana for it, and
8 then Gabana, at that point, would transfer that
9 inventory to the -- to the facility at Roots.

10 Q. Mm-hmm.

11 A. There was some shipments of inventory as
12 it related to later time -- in the transaction, that
13 inventory was actually picked up by some of the
14 retailers directly from the expeditors international
15 warehouse with --

16 Q. Mm-hmm.

17 A. -- no involvement from Roots --

18 Q. Mm-hmm.

19 A. -- or others.

20 Q. You knew that most of it was ending up in
21 the Roots warehouse; right?

22 A. Yes, most of it went to the Roots
23 warehouse, where I was instructed that it was then
24 distributed to the various markets. So it would be
25 sent to Qatar, it would be sent to the warehouse in
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1 the Jebel Ali zone in Dubai -- or in Jebel Ali, the
2 duty-free zone, to the RSH warehouse. In addition,
3 it would be sent to the American Casual store in
4 Switzerland.

5 But again, that was completely under the
6 transaction which Gabana had described as a -- using
7 them as a service provider, and the inventory
8 transfer from Gap was to Gabana, which was
9 stipulated by the contract as a distributor, which
10 we had with Gabana.

11 Q. Okay. To your knowledge, the first time
12 that conversation occurred was in 2005; correct?

13 A. The --

14 MR. JACKSON: Objection, vague.

15 BY MR. HANEY:

16 Q. The conversation where Mr. Larsen told you
17 that he was using Roots as a service provider?

18 A. That is the first time that I had the
19 conversation with Mr. Larsen.

20 Q. Okay. And nobody at Gap told you that
21 that was the case prior to that?

22 A. No, not to my knowledge, no.

23 Q. What -- before you went to Dubai and had
24 these meetings in 2005, how did you think Gabana was
25 distributing the merchandise, the ISP merchandise

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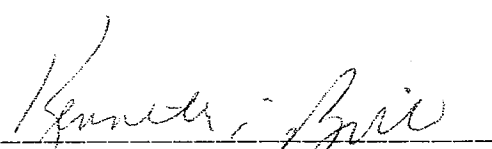
1 CERTIFICATE OF REPORTER

2
3 I, KENNETH T. BRILL, a Certified Shorthand
4 Reporter, hereby certify that the witness in the
5 foregoing deposition was by me duly sworn to tell
6 the truth, the whole truth, and nothing but the
7 truth in the within-entitled cause;

8 That said deposition was taken down in
9 shorthand by me, a disinterested person, at the time
10 and place therein stated, and that the testimony of
11 the said witness was thereafter reduced to
12 typewriting, by computer, under my direction and
13 supervision;

14 I further certify that I am not of counsel
15 or attorney for either or any of the parties to the
16 said deposition, nor in any way interested in the
17 event of this cause, and that I am not related to
18 any of the parties hereto.

19
20
21 DATED: June 25, 2008

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23
24 
KENNETH T. BRILL
CSR 12797

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